

Bradford Local Plan

Core Strategy Examination Session day Nine

Matter 4E: Housing Provision (Allocation Principles)

Date: 18th March 2015

Venue: Victoria Hall, Saltaire

Key issue:

Is the Council's approach to establishing housing site allocation principles consistent with national guidance (NPPF/PPG)?

Is the approach to establishing housing site allocations, including the various criteria, supported by evidence, and is it effective, clear and soundly-based

1. Council's Response

- 1.1. Given the scale of housing growth required to meet the needs of the district's growing population, it is essential that the decisions taken in selecting sites for development results in the most sustainable portfolio of sites possible.
- 1.2. While the Core Strategy does not in itself allocate sites it is considered important that it sets the strategic policy framework to guide this process in the rest of the Local Plan. Both the NPPF and the Core Strategy's vision suggest that sustainable development and management should be at the heart of the growth and economic transformation that is envisaged over the period of this plan.
- 1.3. Policy HO7 will help achieve this. Policy HO7 sets out some of the most important guiding principles which will be used to compare, contrast and evaluate alternative candidate sites for housing development within the Allocations DPD, the Bradford City Centre AAP and the Shipley & Canal Road Corridor AAP. The criteria listed within the policy will assist in achieving a number of the objectives set out in section 3 of the Core Strategy, particularly those aimed at safeguarding and enhancing the environment of the district.
- 1.4. All of the various elements within Policy HO7 are in the Council's view consistent with the content of the NPPF. They set the correct framework without being unduly prescriptive. They are clear, justified and sound.

2. Council's Response

Does the policy properly consider the balance between homes and jobs, and between prioritising brownfield against greenfield land?

- 2.1. The balance between homes and jobs is a key element of the Core Strategy. Proposals for both have been informed by robust and proportionate evidence and are also designed to align with both the Council's corporate goals for achieving growth and regeneration and the goals of the Leeds City Region Strategic Economic Plan (SEP) (PS/B001b xv). In both cases the proposals are positive but deliverable.
- 2.2. In the Council's view Policy HO7 includes the right approach to prioritising the use of brownfield land. The key principle of both Policy HO7 and Policy HO6 is to ensure that as far as possible the plan promotes the use of deliverable and developable brown field sites. It is not however the policy of the plan to operate an inflexible approach, for example a brownfield first approach, since this would be contrary to the NPPF and would also undermine housing delivery. The sites allocated for development within the Local Plan must reflect the full range of criteria which determine a site and location's sustainability of which a site's brown field status is but one. Moreover the approach taken throughout the plan and in Policy HO7 is balanced in that it recognises that to ensure delivery of the required number of new homes a substantial contribution from green field sites will be required.

**Does the policy recognise Green Belt constraints and regeneration issues?
Does the policy consider maximising environmental benefits and minimising environmental impact?**

3. Council's Response

- 3.1. The Council considers that Policy HO7 takes the right approach to all these different elements.
- 3.2. While the policy accepts that meeting housing need will require a contribution from green belt it also stresses that such use of green belt land should be minimised. The NPPF suggests that the correct mechanisms for considering changes to the green belt is through a local plan preview and that change can be brought forward but only where exceptional circumstances are demonstrated. Such circumstances are clearly revealed by the land supply analysis of the SHLAA and supported by the results of the Bradford Growth Assessment.
- 3.3. Policy HO7 includes a range of principles which seek to ensure that the site allocations process, where possible maximises environmental benefits whilst minimising environmental impacts. Its important to underline the role and impact which the site related choices will make on the district when a quantum as large as 42,100 new homes needs to be provided. The right choices have the potential not only to meet the housing needs of the district but to have added value in terms of reduction in derelict and vacant land, fostering sustainable travel patterns and thus reducing traffic, pollutions and greenhouse gases emissions, and securing regeneration.